

JAJ:DSS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M10-1207**

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UNITED STATES OF AMERICA

COMPLAINT

- against -

SYED OMAIR ALI,

(18 U.S.C. § 1001(a)(2))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MEHTAB SYED, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation, ("FBI") duly appointed according to law and acting as such.

Upon information and belief, on or about and between May 12, 2010 and October 14, 2010, within the Eastern District of New York and elsewhere, the defendant SYED OMAIR ALI did knowingly and willfully make materially false, fictitious and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States.

(Title 18, United States Code, Section, 1001(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I have been a Special Agent with the FBI for approximately five years. Currently, I am assigned to the New York City Joint Terrorism Task Force ("JTTF"). The JTTF investigates offenses involving international and domestic terrorism. As a Special Agent with the FBI, I have investigated numerous cases involving violations of federal criminal laws. During the course of those investigations I have conducted physical surveillance, interviewed witnesses, executed search warrants and used various investigative techniques to secure relevant information.

2. The information set forth below is based on my own personal involvement in this investigation, as well as my review of records, reports and documents obtained from, and conversations with, other law enforcement agents.

3. On or about May 12, 2010, SYED OMAIR ALI sent an email from a location in Queens, New York to the FBI via the FBI's public website. In that email, ALI stated, in sum and substance and in part, that several individuals, whom he

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<sup>1/</sup> Because the purpose of this complaint is merely to establish probable cause to arrest, I have not set forth all of the facts and circumstances regarding this investigation of which I am aware.

identified, were planning to commit a terrorist attack in the United States.

4. Specifically, ALI stated that an individual whom he identified ("individual #1") "has ties with the tribal guys back in Karachi-Pakistan" and "has been planning on hurting our motherland." In addition, ALI stated that another individual whom he identified ("individual #2") and individual #1 planned to "fund those guys back in Karachi, get the appropriate training there and come back and do the max damage here." ALI further stated that individual #1 and individual #2's "plans of hurting our homeland are pretty obvious . . ."

5. After ALI sent this email to the FBI, he was voluntarily interviewed on multiple occasions by FBI agents between May 2010 and October 2010. During those interviews, ALI maintained that the information he had sent to the FBI in the May 12, 2010 email was accurate, and provided additional information and details regarding this purported plot.

6. For example, on October 8, 2010, ALI was interviewed by FBI agents. During that interview, ALI stated that individual #1 had connections to an extremist organization based in Pakistan. ALI also stated that individual #1, individual #2, and a third individual whom ALI identified ("individual #3") had discussed potential targets to attack in New York City, and had decided that an attack in Times Square


would be most desirable since it would likely inflict the greatest number of casualties.

7. On October 14, 2010, ALI was voluntarily interviewed again by FBI agents. Prior to the interview, ALI was given Miranda warnings and signed a written Miranda waiver form. During the interview, ALI admitted that all of the information he had previously provided to the FBI regarding a terrorist plot had been false, and that he had deliberately misled the FBI. ALI also signed a written statement in which he admitted providing false information to the FBI regarding this purported plot.


8. Specifically, ALI admitted that the information in the May 12, 2010 email regarding individual #1's ties to "tribal guys" in Pakistan was false, as well as the statement that individual #1 planned on "hurting our motherland." In addition, ALI admitted that the information in the May 12, 2010 email regarding individual #2's involvement in the purported plan to attack the United States was false. ALI admitted that he had

provided this false information to the FBI, in part, "to get [individual #1] in trouble due to a personal conflict . . ."

WHEREFORE, your deponent respectfully requests that the defendant SYED OMAIR ALI be dealt with according to law.

  
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MEHTAB SYED  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
15th day of October, 2010

  
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HONORABLE  
UNITED STATES  
EASTERN DISTRICT OF NEW YORK

S/Levy

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